

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
ALBANY DIVISION

PERMANENT GENERAL
ASSURANCE CORPORATION OF
OHIO,

Plaintiff,

v.

DANIEL MARK MINICK,
MARK MINICK, MINICK
INTERIORS, INC., PROGRESSIVE
MOUNTAIN INSURANCE
COMPANY, THE ESTATE OF
MICHAEL THOMAS MORRIS,
LYNTON GODWIN, and
FREDERICK UPDIKE,

Defendants.

Civil Action File No.:
1:22-CV-00197-LAG

JOINT MOTION TO DISMISS
PROGRESSIVE MOUNTAIN INSURANCE COMPANY

COME NOW Petitioner Permanent General Assurance Corporation of Ohio and Respondent Progressive Mountain Insurance Company (collectively, the “Parties”) and hereby jointly move for the voluntary dismissal of Respondent Progressive Mountain Insurance Company with prejudice pursuant to Federal Rule of Civil Procedure 21. Plaintiff shall continue to prosecute this case against the remaining Defendants.

The Clerk of Court, United States District Court, Middle District, Albany Division is respectfully requested to mark the Court's records to reflect that Respondent Progressive Mountain Insurance Company is hereby dismissed with prejudice from the above-styled case.

Respectfully submitted and consented to on this 18th day of January, 2023.

KERSHAW WHITE, LLC

/s/ Jeffrey A. Kershaw
(by Sam Sabulis with express permission)
JEFFREY A. KERSHAW
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(Signatures follow on next page)

LUEDER LARKIN & HUNTER, LLC

/s/ Samuel H. Sabulis

SAMUEL H. SABULIS

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CERTIFICATION OF COMPLIANCE

The Undersigned Counsel hereby certifies that the foregoing has been prepared using Times New Roman 14-Point Font, as approved in LR 5.1C.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 18th day of January, 2023, upon all attorneys to this matter by filing with the Court's CM/ECF system, which will automatically e-mail notification of same to the following counsel of record as follows:

Jeffrey A. Kershaw, Esq.
R. Patrick White, Esq.
Kershaw White, LLC
5881 Glenridge Drive, Suite 100
Atlanta, Georgia 30328

Respectfully submitted, this 18th day of January, 2023.

LUEDER, LARKIN & HUNTER LLC

/s/ Samuel H. Sabulis

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